COVID-19 Pandemic
A Study in Comparative Ethics

Celia A Booth, CIH, CSP, ARM
Joy Erdman, MS, CIH, CSP, FAIHA
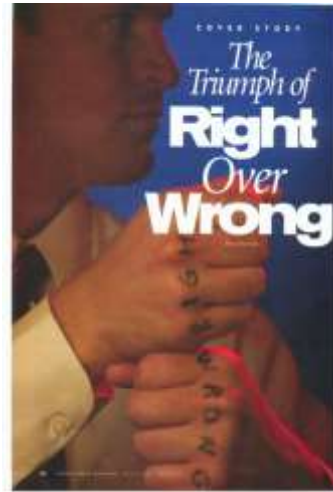
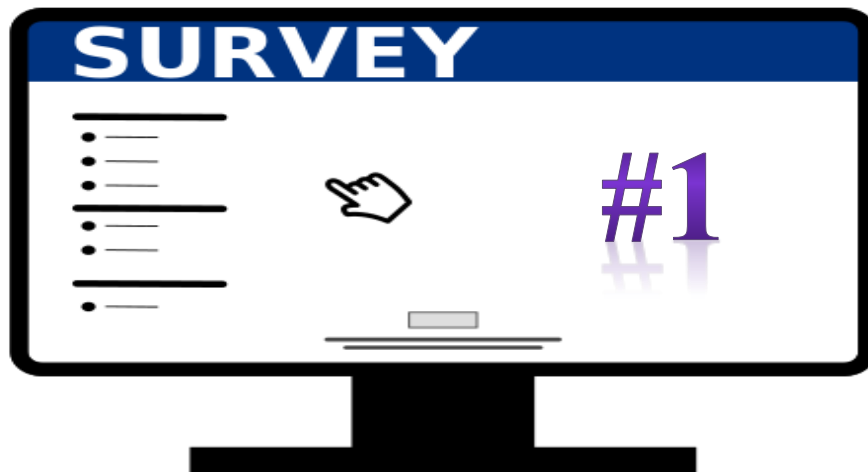**AIHA Potomac Section**

February 22, 2021
2 hours

The Triumph of **Right** Over **Wrong**

Please Note:
The case study used in this session is intended to generate discussion about the topic of ethics. The instructors do not endorse any particular position regarding the case study.
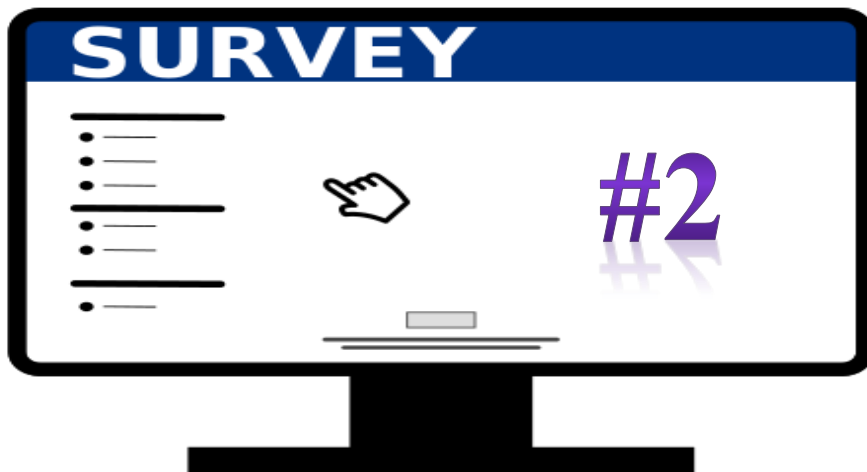
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2

Polling Question

1. Why are you here today?

Choose all that apply.

A. Need Ethics training for certification
B. Love to discuss ethics in our profession
C. Nothing better to do during lunch
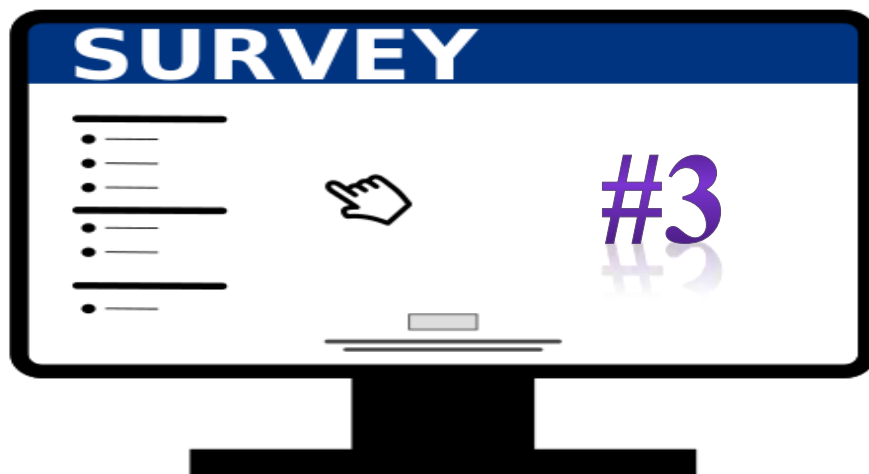D. I'm part of the Joy & Celia fan club
E. Other (Please specify in chat)

Polling Question

2. Are you employed in the public health field?

A. Yes
B. No

Polling Question

3. Are you assisting your employer or an industry with reopening following closure from the pandemic?

A. Yes (Please specify industry type in chat)
B. No

Quick Quiz

Think of a recent ethical dilemma you have faced.
Ask yourself:

1. Were my actions legal?
2. Was I being fair and honest?
3. Will my action stand the test of time?
4. How did I feel about myself afterwards?
5. How would it look in the newspaper?
6. Did I sleep soundly that night?
7. What would I tell my child to do?
8. How would I feel if my family, friends, and neighbors knew what I was doing?
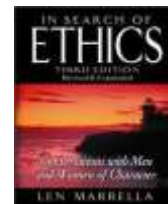
Ref: Marrella, Len. In Search of Ethics: Conversations with Men and Women of Character, 3rd Edition, DC Press, 2009.

Today's Plan

1. Discuss the concept of ethics and how it is measured in companies and how it is enforced for the CIH.

2. Review the JHU Berman Institute of Bioethics Ethical Framework for the COVID-19 Reopening Process.

3. Review the BGC Code of Ethics for Industrial Hygiene and APHA Code of Ethics for Public Health.

4. Team Break-Out to examine how our code of ethics (CIH) is similar to and different from the APHA code of ethics used for this case study.

5. Team Break-Out to apply the industrial hygiene and public health codes of ethics to the JHU Institute of Bioethics Framework for Covid-19 Reopening Process and identify ethical dilemmas.

6. Team members present their findings about how the six steps posed by the JHU Bioethics Framework are supported by the APHA and BGC COE.

7. Summarize what we've learned.

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Ethics in the Year of COVID-19

- **WHO: Ethics and COVID-19**
- **CDC: Ethical Dilemmas in Rural Health**
- **AMA: COVID-19 Ethics Resource Center**
- **American College of Surgery: Ethical Dilemmas Due to the COVID-19 Pandemic**
- **New England Journal of Medicine: Fair Allocation of Scarce Medical Resources in the Time of COVID-19**
- **Mayo Clinic: COVID-19 Research and Ethics**

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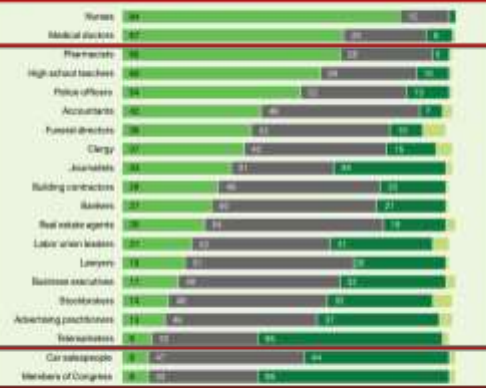# Gallop Poll: Honesty & Ethical Standards Ranking by Profession

Nurses
Medical Doctors
..
..
..
..
..
..
..
Car Salespeople
Members of Congress

Please tell me how you would rate the honesty and ethical standards of people in these different fields -- very high, high, average, low or very low?

Gallup has measured the public's views of the honesty and ethical standards of a variety of occupations since 1976. While the list changes from year to year, some professions have been included consistently over the past four decades.

Ref:
https://news.gallup.com/poll/274673/nurses-continue-rate-highest-honesty-ethics.aspx

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How CIHs Could Lose Certification

Detailed Description of Complaints from 2006 through Today

Complaint accepted for further investigation and sent to CIH for response*	22
"Mediated"	1
Complaint dropped by complainant or insufficient evidence to proceed	17
TBD, waiting for additional information from complainant	6
Total Complaints	**46**

*Breakdown of results provided in the table, below.

Outcome of Investigations

CIH received a sanction	6
Agreement to address concerns developed w/Respondent, so no Ethics Committee review	2
Dismissed because complaint was unfounded	11
Investigation in Progress	2
Investigation terminated (e.g., CIH passed away during process)	1
Total Investigations	**22**

https://ehscredentialing.org/cih-ethics-cases/

BGC* ETHICS CHARGE STATEMENT

1. **Statement of Complaint**
2. **Applicable Provisions of the Code of Ethics**
3. **Related Actions (Including "Have you voiced your opinion to the CIH?")**
4. **List of Witnesses and Documents to be Submitted and Considered**

Ref: https://ehscredentialing.org/ethics/chargestatement/

* BGC = Board for Global EHS Credentialing

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How CIHs Could Lose Certification

Examples of activities that could garner a Board for Global EHS Credentialing (BGC) ethics investigation:

- **Submission of fraudulent documents or falsifying information**

- **Quality of work performed (e.g. incomplete, incompetent, or not qualified to perform)**

- **Conflict of interest concerns**

- **Disclosure of criminal convictions**

- **Using the CIH credential improperly**

BGC Ethics case procedures are described at
http://abih.org/sites/default/files/downloads/Ethics%20Case%20Procedures%20July%202017.pdf

Ref: http://www.abih.org/about-abih/unauthorized-use

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Can ethics be measured in an organization?

- **Since 2007, Ethisphere has recognized the world's most ethical companies (from those who compete for recognition) – 132 recognized this year**

- **Ethisphere hosts the Business Ethics Leadership Alliance (BELA), which includes:**
  - **Peer & Mentor Network**
  - **Benchmarking**
  - **Centers of Excellence**
  - **Ethical Culture Quotient**
  - **Live & Virtual Events**
  - **Resources & Research**

- **A redacted Ethisphere scorecard is available at:**
  - https://ethisphere.com/wp-content/uploads/REDACTED_2016_eq_scorecard.pdf

- **Honorees listed at:** https://worldsmostethicalcompanies.com/honorees
  Ref: https://ethisphere.com/128-worlds-most-ethical-companies-for-2019/

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What is Contained in the Ethics Quotient Survey?

ETHI**SPHERE**

Section
1. Introduction
2. Organizational Profile
3. Corporate Governance
4. Ethics and Compliance Program
5. Third Party Management
6. Citizenship, Sustainability, and Corporate Responsibility
7. Leadership and Reputation
8. Conclusion

4A. Program Structure, Resources, Oversight

4B. Due Care

4C. Written Standards

4D. E&C Training, Communications & Awareness

4E. Detection, Monitoring & Auditing

4F. Enforcement, Discipline & Incentives

4G. Measuring Ethical Culture

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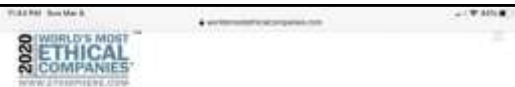
A Letter from Ethisphere's CEO

Benchmark

World-class program

Greater good

Seat at the board

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Personal ethical standards

A. **Professional ethics**
   Obligation Levels (Personal, Organizational, Societal)
B. **Think about your ethics before you need to use them**
C. **When to take a stand**
D. **Remember who you're really working for:**
   THE WORKER (in occupational settings)
   THE PUBLIC (in environmental settings)
E. **Ethics** - moral principles that govern a person's behavior.
F. **Ethical Dilemmas** - is a complex situation that often involves an apparent mental conflict between moral imperatives, in which to obey one would result in transgressing another.

In Search of Ethics, by Len Marella

- **End-based thinking or Utilitarianism**

- **Rule-based thinking or Categorical Imperative**

- **Care-based thinking or Golden Rule**
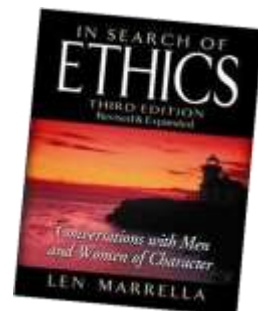
Steps to Resolving an Ethical Dilemma

1. **Consider the consequences**

2. **Analyze potential actions & behaviors**

3. **Make a tentative decision**

"The following steps are derived from ethical guidelines issued by Loyola Marymount University.

Step 1: Consider the consequences. For each option, make a list of those who will be helped if you acted, and make similar lists of those who will be hurt or negatively affected. Next, ask yourself the following questions:

- **What levels of benefit and harm are involved for each option? Some issues—worker health, for example—are more valuable than others, such as corporate quarterly profits.**
- **What is likely to happen over both the long run and the short run? For example, is avoiding a short-term embarrassment for your boss as important as saving a worker from long-term health problems?**

After considering each option, determine which one seems to offer the most benefit and the least harm.

Step 2: Analyze potential actions and behaviors. Instead of thinking about consequences, ask yourself:

- **How does each potential action fit with traditional moral principles?**
- **Do any of the actions you're considering "cross the line" in anything from decency to any of the ethical principles found in the three IH Codes of Ethics?**

Again, choose an option whose actions are least problematic.

Step 3: Make a tentative decision. Ask yourself, "How will I feel if I actually go forward with this decision?" If you have doubts, repeat Steps 1 and 2 until you are comfortable."
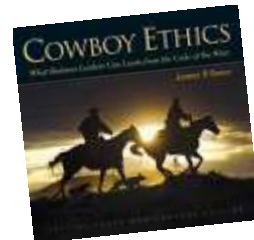
Ref: AIHA Synergist, "Ethics Case Studies", D. Jeff Burton, MS, PE, Jan 2015.

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Cowboy Ethics

What it takes to win at life is a 4-legged stool:

- **Attitude**
- **Integrity**
- **Grit**
- **Purpose**

The Center for Cowboy Ethics and Leadership sponsors ethics training for adults and teens through outreach programs.

Learn more at http://www.cowboyethics.org

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The Code of the West

- **Live each day with courage**
- **Take pride in your work**
- **Always finish what you start**
- **Do what has to be done**
- **Be tough, but fair**
- **When you make a promise, keep it**
- **Ride for the brand**
- **Talk less and say more**
- **Remember that some things aren't for sale**
- **Know where to draw the line**

Johns Hopkins University Berman Institute of Bioethics: An Ethics Framework for the COVID-19 Reopening Process

- **Step 1: Select Policies and Consider Feasibility**
- **Step 2: Well-Being**
- **Step 3: Liberty**
- **Step 4: Justice**
- **Step 5: Legitimacy**
- **Step 6: Mitigation and Remedies**
- **Step 7: Overall Assessment**

Ref:
https://bioethics.jhu.edu/research-and-outreach/covid-19-bioethics-expert-insights/resources-for-addressing-key-ethical-areas/grappling-with-the-ethics-of-social-distancing/

Teams - All will have BGC (CIH) & APHA Codes of Ethics, and will examine one of the steps in the JHU COVID-19 Reopening Framework:

Step 1: Select Policies and Consider Feasibility

Step 2: Well-Being

Step 3: Liberty

Step 4: Justice

Step 5: Legitimacy

Step 6: Mitigation and Remedies

Step 7: Overall Assessment (To be done together, as a group)

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Board for Global Credentialing (BGC)

Effective 7/1/2020

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American Public Health Association

- **PUBLIC HEALTH CODE OF ETHICS**
- **Updated November 2019**
- **34 pages**
- **6 Public Health Core Ethical Values**
- **12 Domains**
- **87 sub-domains or actions**

https://www.apha.org/-/media/files/pdf/membergroups/ethics/code_of_ethics.ashx

The American Public Health Association champions the health of all people and all communities. We strengthen the public health profession, promote best practices and share the latest public health research and information. We are the only organization that combines a nearly 150-year perspective, a broad-based member community and the ability to influence federal policy to improve the public's health. Learn more at **www.apha.org** .

APHA Core Ethical Values

1. Professionalism & Trust

2. Health & Safety

3. Health Justice & Equity

4. Interdependence & Solidarity

5. Human Rights & Civil Liberties

6. Inclusivity & Engagement

APHA Code of Ethics (COE) Domains

1: Conduct and disseminate assessments focused on population health status and public health issues facing the community

2: Investigate health problems and environmental public health hazards to protect the community

3: Inform and educate the public about health issues and functions

4: Engage with the community to identify and address health problems

5: Develop public health policies and plans

6: Enforce public health laws

APHA COE Domains (cont'd)

7: Promote improved access to social resources conducive to health and health care

8: Maintain a competent public health workforce

9: Evaluate and continuously improve processes, programs, and interventions

10: Contribute to and apply the evidence base of public health

11: Maintain administrative and management capacity

12: Maintain capacity to engage with public health governing entities

Share your ideas

Case Study Discussion Items

1. **Compare & contrast the CIH & APHA codes of ethics.**
=============== reconvene =========================

2. **How does the JHU Ethical Framework Step you are reviewing support either or both of these codes of ethics?**

3. **What are some ethical dilemmas related to your Step and the COVID-19 pandemic reopening?**

4. **Optional, if you have time: How does the distribution of COVID-19 vaccinations meet this Step?**
=============== reconvene =========================

Question 1: Answer items on left for each Code of Ethics (Also, Specify where found in each code)

ACTION	APHA Public Health Code of Ethics	BGC Industrial Hygiene Code of Ethics
Serves (Who):		
Used for (When by APHA & BGC):		
Defines (What) :		
Intended for Enforcement (Where):		
Provides (How):		

Answers to Question 1

Action	APHA Public Health Code of Ethics	BGC Industrial Hygiene Code of Ethics
Serves:	Individuals, societies, and ecosystems (Intro, p.1)	Employees, employers, other clients, the IH profession and the public. (Item 1, p. 1 & Item 2, p. 2)
Used for:	Public Health Agency Accreditation (Public Health Accreditation Board) (Intro, p.1)	Individual Certification, both certificants & candidates (ABIH/BGC) (Introduction)
Defines:	Values, standards and obligations (Intro, p.2)	Guidelines, standards, obligations, & responsibilities (Intro & Preamble)
Intended for Enforcement:	No (Intro, p.2)	Yes (p. 2, last sentence)
Provides:	Decision making framework – set of considerations (Intro, p.1)	Prescriptive responsibilities (all of Items 1 & 2)

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Johns Hopkins University Berman Institute of Bioethics: An Ethics Framework for the COVID-19 Reopening Process

- Step 1: Select Policies and Consider Feasibility
- Step 2: Well-Being
- Step 3: Liberty
- Step 4: Justice
- Step 5: Legitimacy
- Step 6: Mitigation and Remedies
- Step 7: Overall Assessment

Ref:
https://bioethics.jhu.edu/research-and-outreach/covid-19-bioethics-expert-insights/resources-for-addressing-key-ethical-areas/grappling-with-the-ethics-of-social-distancing/

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Breakout Rooms
Share your ideas

Case Study Discussion Items

Johns Hopkins University Berman Institute of Bioethics:
An Ethics Framework for COVID-19 Reopening Process

Room 1 does Step 1: Select Policies and Consider Feasibility

Room 2 does Step 2: Well-Being

Room 3 does Step 3: Liberty

Room 4 does Step 4: Justice

Room 5 does Step 5: Legitimacy

Room 6 does Step 6: Mitigation and Remedies

Step 7: Overall Assessment – We'll do together when we reconvene.

1. Compare & contrast the:
- CIH Code of Ethics Sections IIA, IIB, & IIC and
- APHA Code of Ethics Section 2 (see Slide 20)

============== Reconvene =================

2. How does the JHU Ethical Framework Step you are reviewing support either or both of these codes of ethics?

3. What are some ethical dilemmas related to your Step and the COVID-19 pandemic reopening?

4. Optional, if you have time: How does the distribution of COVID-19 vaccinations meet this Step?

========== Reconvene =================

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Step 7: Overall Assessment –
We'll do together when we reconvene.

If we were to use one word to build an overall assessment from Steps 1 – 6, what would that word be?

B A _ _ _ _ _

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HINTS:

B A _ _ _ _ _

STEP 7: BALANCE

Policy

Liberty

Mitigation & Remedies

Legitimacy

Justice

Well-Being
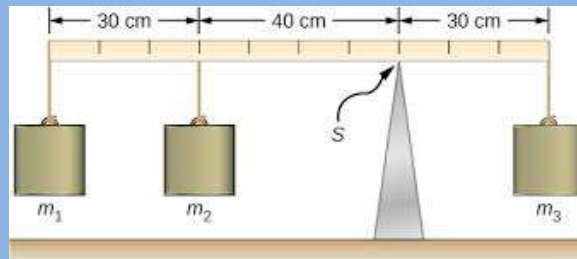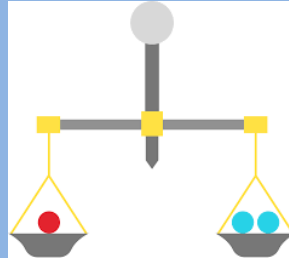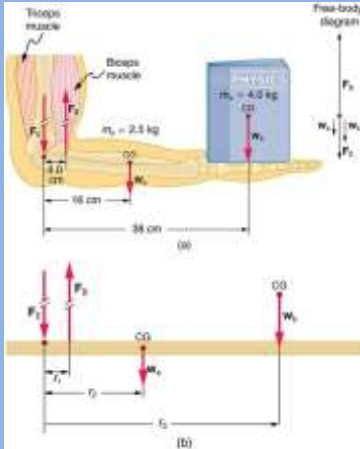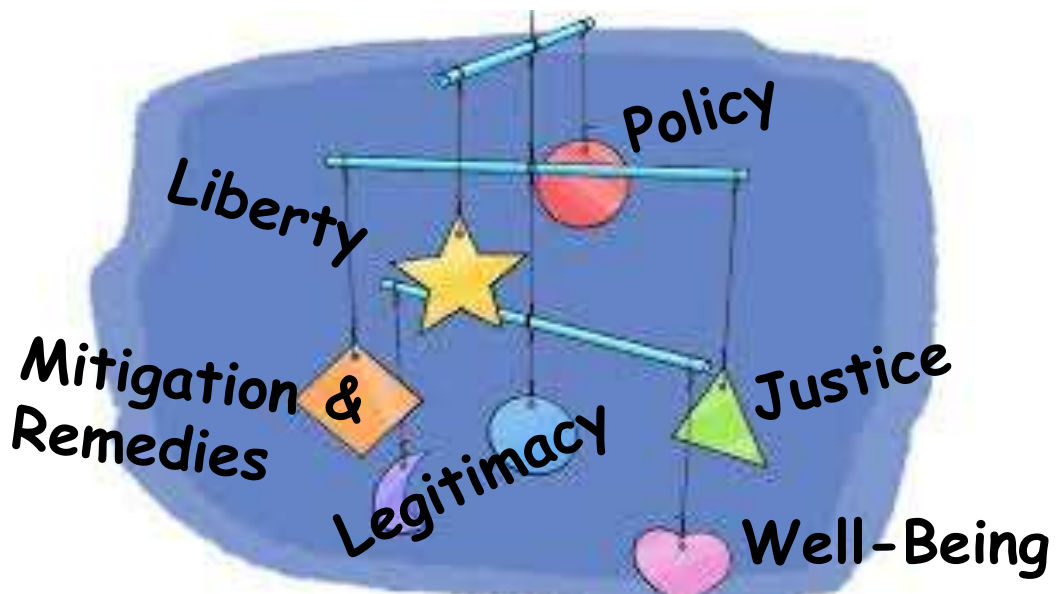
*If we have time....*Lessons Learned from Flint Issue*

1. **Always presume your customer complaints are legitimate.**

2. **Your ethical convictions may be tested the most when you're contending with other crises.**

3. **Don't rely on regulatory actions or inactions as your barometer for performance.**

4. **Your internal audit program should include some deep-dive analysis to spot-check raw data.**

5. **Community relations must be based on <u>open communications</u> & not selective communications.**

6. **Be mindful of both real and perceived conflicts of interest in your organization's management structure.**

7. **Confirm your organization's mission is understood, and that it flows down to your implementing policies and procedures.**

- **Reference: Steve Neilson, MS, CIH, from AIHce 2018 Presentation, "The Flint Water Crisis, Institutional Ethics Considerations" (Used with permission)**

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What did you learn?

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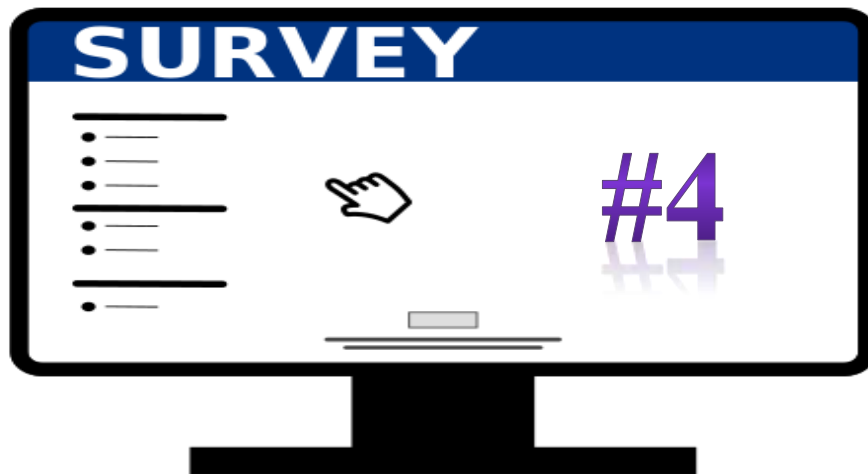
Polling Question

4. What was/were the key takeaways from this session for you?

Choose all that apply.

A. Introduction to the APHA Code of Ethics
B. Sanctions that BGC (formerly ABIH) can impose on a CIH
C. Johns Hopkins University (JHU) has a Bioethics Institute.
D. Reopening Framework from JHU that I hadn't thought about yet
E. I learned more with a partner during the breakout than I would have done alone.
F. Other (Please specify in chat)

Some of the things we've learned today

- ➤ **Reopening during the COVID-19 pandemic poses many ethical dilemmas**
- ➤ **Resolving ethical dilemmas is NOT easy**
- ➤ **Being in compliance may not be enough**
- ➤ **Codes of ethics keep us from doing really dumb things**
- ➤ **Codes of ethics help us make better decisions and balance competing interests.**
- ➤ **Codes of ethics help us face dilemmas and look for win-win opportunities**
- ➤ **Codes of ethics differ among different professions**
- ➤ **Codes of ethics reduce the range of "gray" areas between the "black" and "white" areas**
- ➤ **Ethical Frameworks such as the JHU Bioethics Institute can be a helpful tool in decision-making.**

Ethics Session : How did we do?

✓ **Discuss Personal Ethical Standards**

✓ **Browse BGC and APHA Codes of Ethics**

✓ **Apply the COVID-19 Reopening Framework to identify good and bad ethical behavior and identify ethical dilemmas**

✓ **Participate in your assigned team to**
  - ○ Compare & contrast BGC CIH with APHA Codes of Ethics
  - ○ Think about the JHU Reopening Framework Steps to help to resolve ethical dilemmas during reopening.

✓ **Summarize what we've learned**

✓ **Obtain resources for future use**
(See Appendix to these slides)

COVER STORY
The
Triumph of
Right
Over
Wrong
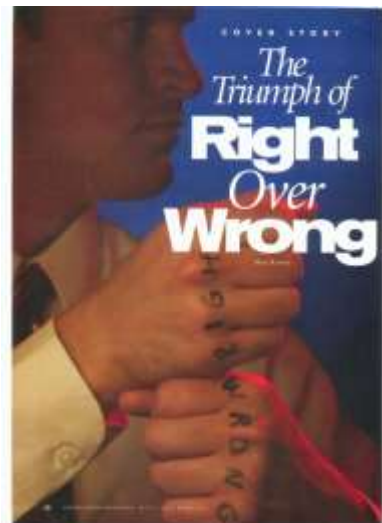
More Questions

Think about and add to chat if you want to share:

1. Did you see similarities and differences in BGC and APHA codes of ethics?

2. Did you learn from each other about the different ethical framework steps based on the JHU Bioethics Berman Institute document?

3. Did you see opportunities to use codes of ethics and ethical frameworks to solve ethical dilemmas?

4. How could we improve this session for future?

Closing: "Are You an Ethical Leader?" *from* The Washington Post

➢ Be a role model of integrity
➢ Set ethical standards for your organization
➢ Provide ethics training
➢ Enhance workplace relationships
➢ Illustrate transparency
➢ Ensure compliance with ethical standards

➢ From Mahatma Gandhi:

"There are seven things that will destroy us:
  - Wealth without work
  - Knowledge without character
  - Politics without principle
  - Pleasure without conscience
  - Religion without sacrifice
  - Science without humanity
  ⭐ Business without ethics"

Thank You
for attending and sharing your ideas!

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Always walk through life as if you have
something new to learn and you will.

- Vernon Howard

Appendix A. Codes of Ethics

NOTE:

In the BGC Code of Ethics for CIH, the yellow highlighting is provided to show changes in most recent update.

Board for Global Certification Code of Ethics (CIH)*

I. **Responsibilities to BGC, the profession and the public.**

    A. Certificant and candidate compliance with all organizational rules, policies and legal requirements.

        1. Comply with laws, regulations, policies and ethical standards governing professional practice.

        2. Provide accurate and truthful representations concerning all certification and recertification information.

        3. Maintain the security of BGC examination information and materials, including the prevention of unauthorized disclosures of test information.

        4. Cooperate with BGC concerning ethics matters and the collection of information related to an ethics matter.

        5. Report, upon a reasonable and clear factual basis, apparent violations of the ethics code by certificants and candidates upon a reasonable and clear factual basis.

        6. Refrain from public behavior that is clearly in violation of professional, ethical or legal standards.

* Effective Date: July 1, 2020

Ref: http://ehscredentialing.org/wp-content/uploads/2020/06/BGC-Code-of-Ethics-2019-11-18-Final-Approved.pdf

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Board for Global Certification Code of Ethics (cont'd)

II. **Responsibilities to clients, employers, employees and the public.**

    A. Education, experience, competency and performance of professional services.

        1. Deliver competent services with objective and independent professional judgment in decision-making.

        2. Recognize the limitations of one's professional ability and provide services only when qualified. The certificant/candidate is responsible for determining the limits of his/her own professional abilities based on education, knowledge, skills, practice experience and other relevant considerations.

        3. Maintain and respect the confidentiality of sensitive information obtained in the course of professional activities unless: the information is reasonably understood to pertain to unlawful activity; a court or governmental agency lawfully directs the release of the information; the client or the employer expressly authorizes the release of specific information; or, the failure to release such information would likely result in death or serious physical harm to employees and/or the public.

        4. Properly use professional credentials, and provide truthful and accurate representations concerning education, experience, competency and the performance of services.

Board for Global Certification Code of Ethics (cont'd)

II. **Responsibilities to clients, employers, employees and the public (Continued)**

A. Education, experience, competency and performance of professional services (continued).

5. Provide truthful and accurate representations to the public in advertising, public statements or representations, and in the preparation of estimates concerning costs, services and expected results.

6. Recognize and respect the intellectual property rights of others and act in an accurate, truthful and complete manner, including activities related to professional work and research.

7. Affix or authorize the use of any issued BGC organization's seal, stamp, signature or other signifier of certification by the certificant only when the document is prepared by the certificant/candidate or has been fully reviewed and approved by the certificant/candidate. Any such use does not represent BGC approval of the work so endorsed.

8. Communicate clearly, to clients and/or employers, the potential consequences if professional decisions or judgements are overruled or disregarded.

Board for Global Certification Code of Ethics (cont'd)

II. **Responsibilities to clients, employers, employees and the public (Continued)**

B. Conflict of interest and appearance of impropriety.

1. Disclose, to clients or employers, significant circumstances that could be construed as a conflict of interest or an appearance of impropriety.

2. Avoid conduct that could cause a conflict of interest with a client, employer, employee or the public.

3. Assure that a conflict of interest does not compromise legitimate interests of a client, employer, employee or the public and does not influence or interfere with professional judgments.

4. Refrain from offering or accepting significant payments, gifts or other forms of compensation or benefits in order to secure work or that are intended to influence professional judgment.

Board for Global Certification Code of Ethics (cont'd)

II. Responsibilities to clients, employers, employees and the public (Continued)

C. Public health and safety.

1. Follow appropriate health and safety procedures, in the course of performing professional duties, to protect clients, employers, employees and the public from conditions where injury and damage are reasonably foreseeable.

Any violation of the preceding numbered requirements may result in sanctions up to and including the suspension or removal of credentials awarded by the BGC.

Ref: http://ehscredentialing.org/wp-content/uploads/2020/06/BGC-Code-of-Ethics-2019-11-18-Final-Approved.pdf

Effective Date: July 1, 2020

Board for Global Credentialing (BGC)

Code of Ethics
Effective 7/1/20

American Public Health Association

- **PUBLIC HEALTH CODE OF ETHICS**
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Ref:
https://www.apha.org/-/media/files/pdf/membergroups/ethics/code_of_ethics.ashx

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Additional Resources
(including other Profressions' Codes of Ethics)

BGC/CIH: https://ehscredentialing.org/wp-content/uploads/2020/06/BGC-Code-of-Ethics-2019-11-18-Final-Approved.pdf

APHA: https://www.apha.org/-/media/files/pdf/membergroups/ethics/code_of_ethics.ashx

JHU: https://bioethics.jhu.edu/research-and-outreach/covid-19-bioethics-expert-insights/resources-for-addressing-key-ethical-areas/grappling-with-the-ethics-of-social-distancing/

ICOH: http://www.icohweb.org/site/code-of-ethics.asp

IOHA: https://ioha.net/files/2015/11/IOHA-Code-of-Ethics-2012.pdf

E = Engineers - Civil Engineer: http://www.asce.org/code_of_ethics/ (2017) or https://www.asce.org/uploadedFiles/About_ASCE/Ethics/Content_Pieces/2020-asce-proposed-coe.pdf (2020)

F = Federal Gov't (EPA): https://www.justice.gov/archives/ncfs/page/file/761076/download or **https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs144p2_068009.pdf and**

I = Industry – General Motors: https://investor.gm.com/static-files/265a1dc0-adc5-4d38-ab41-2c58e575692d

L = Local Government – International City Managers Association: https://icma.org/documents/icma-code-ethics-amended-june-2020

M = Media/Journalists: http://www.spj.org/pdf/spj-code-of-ethics.pdf

P = Physicians: Ref: https://acoem.org/acoem/media/PDF-Library/About_ACOEM/Code-of-Ethics-Condensed-Version.pdf & https://acoem.org/about-ACOEM/Governance/Code-of-Ethics

S = State Government – Michigan: https://www.michigan.gov/mdcs/0,4614,7-147--115874--,00.html or https://www.michigan.gov/deq/0,4561,7-135-3306-276848--,00.html and
Great Lakes Water Authority: https://www.glwater.org/wp-content/uploads/2018/06/GLWA-Procurement-Policy-FINAL-11.14.18.pdf and https://www.glwater.org/about/what-is-glwa/

U = University/Academia http://www.aaup.org/report/statement-professional-ethics

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